UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

March 8, 1994

Diane M. Leber
Ciba-Geigy Corporation
444 Saw Mill River Road
Ardsley, New York 10502-2699

Re: Ciba-Geigy Cranston Site - QA Plan Comments

Dear Ms. Leber:

The EPA has completed its review of Ciba-Geigy's ETL QA Project Plan submitted in February 1994. There are several questions and comments that must be addressed before we can approve this plan. The response to comments #1 - 10 will require corrections (i.e., page changes) to the QAPjP and the response to comments #11 - 17 can be in either letter form or page changes to the QAPjP, as appropriate.

1. The QAPjP should indicate whether the TCLP extraction and analytical procedures will be used to characterize waste from this site. If the TCLP procedure will be used, then the QAPjP must address this procedure and the associated methods quality control requirements.

2. On page 5-3, Table 5.1, information should be provided on how the recovery ranges and maximum RPD for the parameters listed were derived for the spiked samples.

3. Several typos were found in Table 5.3 page 5-5. If ETL wants % RPD and the % Recovery to be the same as the ones used in the Contract Laboratory Program, then make the following changes:

1,4-Dichlorobenzene	soil	%RPD	28 *****→ 27
	water	%Rec.	197 ****→ 97
2,4 Dinitrotoluene	water	%RPD	31 *****→ 38
Pyrene	water	%Rec.	126 ****→ 127
Phenol	water	%Rec.	89 *****→ 110

4. On page 6-1, Section 6.0, the source of the laboratory pure water must be specified. The procedure or documentation requirements for the organic quality of the water (i.e. how is the purity of the water verified) must be included in the QAPjP.

5. On page 6-2, Table 6.1, the purgeable organics must be acidified with HCl to a pH of less than 2. This pH must be verified with pH paper by collecting a third vial specifically for this purpose. After the pH is verified, equal amounts of acid can be added to the two field samples. This procedure must be documented in the QAPjP.

6. On page 8-2 the methods and type of instruments listed in Table 8.1 do not list any gas chromatographs with electron conductivity or phosphorus specific detectors. The QAPjP must document the instrumentation that the laboratory will use to analyze for SW-846 Methods 8150, 8141, and 8080 as indicated in Table 6.1 on page 6-2.

7. In Section No. 9.1, Table 9.5 should really be Table 9.8.

8. In Table 9.2 check the recovery range for Dibromofluoromethane for water. Table 9.2 has 115% while SW-846 has 118%. This discrepancy should be clarified in the QAPjP.

9. In Section 9.4, Table 9.3 should be changed to Table 9.6.

10. On page 9-9, why are the EQLs five times higher for the soil matrix as compared to the aqueous matrix for method 8260? Given a five gram soil sample the EQLs should be 5 ug/Kg. This should be explained or corrected in the QAPjP.

11. On page 11-2 will blank corrections be made if contamination is found in the volatile organic analyses? If the answer is "yes" this should be indicated in the QAPjP.

12. On page 11-3 ETL indicates that they use control charts to follow the matrix spike and matrix spike duplicate QC results. Are control charts used for surrogate recoveries for 8260 and 8270? A recent example of any control charts used for these two methods should be included. Also, how are the upper and lower limits on the control chart calculated?

13. On page 11-3, the text states "If either of these criteria do not meet the control chart limits, the analysis of all samples in those analytical batches are repeated." What is the corrective action if the recoveries for the reanalysis are still outside control limits?

14. Are the area responses of the internal standards monitored for samples analyzed by 8260 and 8270? If these areas of the internal standards change by more than a factor of two as compared with the last daily calibration standard, what does ETL do?

15. In Section No. 14 it indicates that the estimated quantitation limits (EQL) are derived from the MDL data. However, in Table 9.8 (8260) and Table 9.9 (8270) the EQLs are too uniform to have been derived from MDL data. Explain how the EQLs were chosen.

16. Are the EQLs listed in Tables 9.6, 9.7, 9.8 and 9.9 low enough to meet the needs of the river modeling work?

17. On page 15-1, are the acceptance limits for precision and accuracy those limits updated by internal control charts?

The response to these comments should be sent to me and a copy sent to Steve Stodola at the following address:

US EPA
Environmental Services Division
60 Westview Street
Lexington, MA 02173-3185

If you have any questions on the format for resolving these comments, please contact me at (617) 573-9643.

Sincerely,

Frank Battaglia

Frank Battaglia, Environmental Engineer
MA & RI Waste Regulation Section

RESPONSE TO BE IN FORM OF NEW DOCUMENT & COVER LETTER WITH INDIVIDUAL RESPONSES TO EACH COMMENT & A KEY TO SPECIFIC LOCATIONS IN NEW DOCUMENT. SPOKE TO JIM RISSER @ CLOE 3-11-94